

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of

Restoring Internet Freedom WCB Docket No. 17-108

Comments by
Marcia Brooks
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July 10, 2017

I am writing to respectfully convey my strong opposition to the Notice of Proposed Rulemaking that would undermine the Open Internet Order and undo critical net neutrality protections.

I'm greatly concerned that without these protections, Internet Service Providers will be able to harm free speech, allow censorship, and stifle innovation by favoring their own content and slowing down the broadband speed of others – and/or blocking content altogether. It is easy to say now that would not be their intent, but without adequate protections, far too much of our democracy would be at risk, and worse, for purposes of corporate profit.

I do not believe the contention that Title II classification thwarts the ability of ISPs to invest in innovation or build out their networks; I do believe they would largely not otherwise be incentivized to serve pro-consumer interests. The FCC's unraveling of consumer privacy rules is certainly evidence of that.

A May 2017 study by Free Press found that “the total capital investment by publicly traded ISPs was 5 percent higher during the two year period following the FCC's Open Internet vote than it was in the two years prior to the vote”, and that “ISP industry aggregate revenues continue to grow at a rapid pace.” These are only several of many credible and cited research findings that specifically contradict Chairman Pai's adamant anti-Title II stance.

Our democracy relies on a free, fair, and open internet. Every day, journalists, voters, and activists rely on the FCC's Net Neutrality protections to communicate freely online. The internet enables the education of young students and lifelong learners, and helps advance the benefits of an engaged citizenry. It strengthens the ties of families separated by

¹ <https://www.freepress.net/sites/default/files/resources/internet-access-and-online-video-markets-are-thriving-in-title-ii-era.pdf>

distance, helps advance global discourse, and heightens the ability of the U.S. to be digital citizens participating in the U.S. and global economy.

The pay-to-play scenario that would be put in place without an open internet would harm an open marketplace and stifle competition. Small businesses and startups would be greatly disadvantaged, if not entirely shut out of the ability to participate in the open marketplace that has enabled millions of small businesses.

I'm greatly concerned that ISPs will be able to censor and suppress free speech, and make it more difficult to access political and religious speech that does not follow their ideology. This runs counter to democratic ideals and freedoms on which our nation was founded. ISPs should not be able to charge fees for website delivery that would make it harder for blogs, nonprofits, artists, and others to afford to share their innovations and ideas.

When I pay my monthly cable bill for broadband internet access, I understand I am buying guaranteed broadband speeds as well as bundle of information services, including email. I believe it's the FCC's role to maintain authority and expert oversight over broadband providers, and protect consumers in managing the affordability of those services, including keeping broadband classified under the Lifeline program for those who cannot afford it.

I strongly disagree with Chairman Pai that the FCC should take a "light touch" regulatory approach in this regard. Access to the internet is no longer a luxury, it is essential to being a contributing and participating member of society, and ISP's should not have the ability to price-gouge to the exclusion of some of the American people and services developed by and for them.

In a letter dated May 9, 2017 to Chairman Pai,¹³ Senators² wrote: "Net neutrality rules protect the free flow of ideas that are creating new industries, educating our youth, promoting free speech, and supporting the communications that we rely on every day". I also agree with their opposition to the establishment of "voluntary guidelines".

Arguing effectively to keep Title II as a telecommunications service, and not an information service, they note "It was Congress' intent to preserve the FCC's authority to forestall threats to competition and innovation in telecommunication services, even as the technologies used to offer those services evolve over time. Broadband has become the single most important telecommunications service Americans use to transmit information to one another, and it has become clear that innovators, business and consumers overwhelmingly view broadband as a telecommunications service."

I respectfully and strongly urge the Commission to protect the free and open internet by maintaining and enforcing the Open Internet Order.

Respectfully,

Marcia Brooks

² <https://www.markey.senate.gov/imo/media/doc/2017-05-08-NetNeutralityLetter.pdf>